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UTILITIES COMMISSION

1407 W. North Temple, Suite 310
Salt Lake City, Utah 84116

December 31, 2015

VIA OVERNIGHT DELIVERY

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

**Re: Case No. PAC-E-15-16
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR APPROVAL OF THE 2017 PROTOCOL.**

Dear Ms. Jewell:

Please find enclosed for filing an original and nine (9) copies of Rocky Mountain Power's Application, direct testimony and exhibit in the above-referenced matter.

Informal questions should be directed to Ted Weston, Idaho Regulatory Affairs Manager at 801-220-2963.

Very truly yours,

Jeffrey K. Larsen
Vice President, Regulation

Enclosures

Daniel E. Solander (ISB# 8931)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
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Attorney for Rocky Mountain Power

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. PAC-E-15-16
OF PACIFICORP dba ROCKY MOUNTAIN)	
POWER FOR APPROVAL OF THE 2017)	APPLICATION OF ROCKY
PROTOCOL ALLOCATION)	MOUNTAIN POWER
METHODOLOGY)	
)	

I. INTRODUCTION

Rocky Mountain Power, (the “Company” or “Rocky Mountain Power”), a division of PacifiCorp hereby respectfully submits this application (“Application”) in accordance with Idaho Code §61-502, §61-503, and RP052, to the Idaho Public Utilities Commission (“Commission”) and requests approval of PacifiCorp’s 2017 Protocol inter-jurisdictional allocation method (the “2017 Protocol”). In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp. PacifiCorp is an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power division in the states of Idaho, Utah, and Wyoming, and through its Pacific Power division in the states of California, Oregon, and Washington.

2. Rocky Mountain Power is a public utility authorized to do business in the state of Idaho. The Company is subject to the Commission’s jurisdiction with respect to its prices and

terms of electric service to retail customers in Idaho. Rocky Mountain Power provides retail electric service to approximately 73,600 customers in the state.

3. Communications regarding this filing should be addressed to:

Ted Weston
Idaho Regulatory Affairs Manager
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, Utah 84116
Telephone: (801) 220-2963
Email: ted.weston@pacificorp.com

Daniel E. Solander
Senior Counsel
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4014
Email: daniel.solander@pacificorp.com

In addition, Rocky Mountain Power requests that all data requests regarding this Application be sent in Microsoft Word to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 Multnomah, Suite 2000
Portland, Oregon 97232

Informal questions may be directed to Ted Weston, Idaho Regulatory Affairs Manager at (801) 220-2963.

II. BACKGROUND

4. PacifiCorp provides retail electric service to more than 1.7 million customers in the western states of California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp owns substantial generation and transmission facilities. Augmented with wholesale power purchases and long-term transmission contracts, these facilities operate as a single system on an

integrated basis to provide service to customers in a cost-effective manner. PacifiCorp recovers the costs of owning and operating its generation and transmission system in retail prices established from time to time in state regulatory proceedings.

5. In such state regulatory proceedings, it is customary to first determine what assets are used and useful in providing service to customers and the prudence of associated costs to be included in the Company's revenue requirement in the state conducting the proceeding. Because all of the Company's generation and transmission resources and other common or general functions are deemed to be used to serve the Company's customers in all of its state jurisdictions, it is necessary to determine what portion of these costs should be allocated to customers in the state for which prices are being established. If different state commissions make different decisions regarding what resources should be included in PacifiCorp's rate base or if different state commissions adopt different policies for allocating the costs of resources among states, the Company may not be afforded a reasonable opportunity to recover its full cost of providing electric service.

6. Each of PacifiCorp's state regulatory commissions has the ability to pursue policies that it believes are in the public interest in its state. It is also important, however, for PacifiCorp to be able to make business decisions in an environment where differing state policies do not result in preemptively denying the Company a reasonable opportunity to recover its prudently incurred costs. This would create a disincentive for PacifiCorp to invest in its system.

7. The Multi-State Process ("MSP") began in 2002, with PacifiCorp filing applications in each of its six jurisdictions to create a process to consider issues related to its status as a multi-jurisdictional utility. After years of discussions, PacifiCorp sought ratification of an inter-jurisdictional allocation protocol in Idaho, Oregon, Utah and Wyoming. Following

negotiations, the participants agreed to certain revisions to the protocol filed with the commissions (the “Revised Protocol”), which was approved by the commissions in Idaho, Oregon, Utah and Wyoming. The Revised Protocol allocated costs among PacifiCorp’s jurisdictional states and ensured that the Company operated its generation and transmission system on an integrated basis to achieve a least cost-least risk resource portfolio, while allowing each state to independently establish its ratemaking policies. Section XIII.B of the Revised Protocol established a “Standing Committee” for facilitating continued dialogue among the states related to inter-jurisdictional allocation issues.

8. Thereafter, subsequent and substantial discussions occurred to address various concerns raised by stakeholders in different states that resulted in the amendments to the Revised Protocol (the “2010 Protocol”). The 2010 Protocol was agreed to by the parties on September 15, 2010, and was designed to allocate PacifiCorp’s costs among its jurisdictional states in an equitable manner, ensure PacifiCorp plans and operates its generation and transmission system on a six-state integrated basis that achieved a least cost-least risk resource portfolio for customers, allow each state to independently establish its ratemaking policies, and provide PacifiCorp with the opportunity to recover 100 percent of its prudently-incurred costs. The 2010 Protocol was approved by the commissions in Idaho, Oregon, Utah and Wyoming.

9. One of the terms of 2010 Protocol was a specified termination date. Parties to the stipulation agreed that it would only be utilized for regulatory filings made prior to January 1, 2017. Knowing that it would take some time to develop a new allocation methodology, the Standing Committee and Broad Review Work Group (“BRWG”), a workgroup of interested stakeholders, started collaborating in November 2012 to develop potential solutions acceptable to

all parties in the context of an allocation methodology, including the performance of various studies by the Company at the request of the Standing Committee.

10. The 2017 Protocol is the result of general agreement that has been reached between representatives of PacifiCorp and certain Commission staff members, consumer advocates and other interested parties from Idaho, Oregon, Utah, and Wyoming, who are signatories to the 2017 Protocol,¹ (collectively referred to as the “Parties” or individually as a “Party”) regarding issues arising with regards to the 2010 Protocol, PacifiCorp’s status as a multi-jurisdictional utility and future inter-jurisdictional allocation procedures.

11. After approximately three years of discussions and negotiations, in November 2015 the Parties reached an agreement-in-principle that led to the final 2017 Protocol that is being presented in this docket.

III. REQUEST FOR APPROVAL OF 2017 PROTOCOL

12. The 2017 Protocol was developed and the Parties support its adoption to provide PacifiCorp, state commissions, and other interested stakeholders an allocation methodology on a shorter-term basis while the impacts of the Environmental Protection Agency (“EPA”) Rule 111(d) and other multi-jurisdictional issues are better understood and can be more fully analyzed for their allocation impacts on PacifiCorp and its states.

13. The Parties to the 2017 Protocol agreed to support Commission adoption and use of the 2017 Protocol in all PacifiCorp rate proceedings filed after December 31, 2016, up to and

¹ Signatories to the 2017 Protocol include: PacifiCorp, Public Utility Commission of Oregon Staff, the Citizens’ Utility Board of Oregon, the Idaho Public Utilities Commission Staff, Utah Division of Public Utilities, Utah Office of Consumer Services, Wyoming Office of Consumer Advocate, Wyoming Industrial Energy Consumers, and the Wyoming Public Service Commission Staff. Representatives from Washington participated in early discussions, but they are not signatories to the 2017 Protocol since the Washington Utilities and Transportation Commission has adopted a different allocation methodology as part of general rate case proceedings. California representatives did not participate in negotiations, but it implements the multi-jurisdictional allocation methodology as part of general rate case proceedings. The Utah Association of Energy Users was party to the negotiations and, although not available at the time of filing, the Company anticipates receiving a signature page and filing it with the Commission in the near future.

including December 31, 2018. The 2017 Protocol will expire on December 31, 2018, unless all state commissions that approve the 2017 Protocol determine, by no later than March 31, 2017, that the term of the 2017 Protocol should be extended by an optional one-year through December 31, 2019.

14. During the term of the 2017 Protocol, PacifiCorp will continue to analyze alternative allocation methods including but not limited to: corporate structure alternatives, divisional allocation methodologies, alternative system allocation methodologies, potential implications of the EPA Rule 111(d), and possible formation of a regional independent system operator. PacifiCorp will present the results of its analyses of these issues to the MSP BRWG and discuss them at commissioner forums.

15. PacifiCorp commits that its generation and transmission system will continue to be planned and operated prudently on an integrated basis designed to achieve a least cost-least risk resource portfolio for PacifiCorp's customers.

16. The 2017 Protocol describes how the costs and revenues, including wholesale transactions, associated with PacifiCorp's generation, transmission and distribution system will be assigned or allocated among its six state jurisdictions for purposes of establishing retail rates. It describes inter-jurisdictional allocation policies and procedures, which, if utilized by the states for rate proceedings filed after December 31, 2016, is intended to better afford, than would otherwise be the case, PacifiCorp a reasonable opportunity to recover all of its prudently incurred cost of service.

17. The assignment of a particular expense or investment, or allocation of a share of an expense or investment, to a jurisdiction pursuant to the 2017 Protocol is not intended to, and should not prejudice the prudence of those costs. Nothing in the 2017 Protocol abridges any state

commission's right and/or obligation to establish fair, just and reasonable rates based upon the law of that state and the record established in rate proceedings conducted by that state.

18. The Parties who support the ratification of the 2017 Protocol do so with the belief that it will continue to achieve a solution to multi-jurisdictional issues that is in the public interest. A Party's support of the 2017 Protocol, however, is not intended in any manner to negate the necessary flexibility of the regulatory process to deal with changed or unforeseen circumstances, and a Party's support of the 2017 Protocol will not bind or be used against that Party in the event that unforeseen or changed circumstances cause that Party to conclude, in good faith, that the 2017 Protocol no longer produces results that are just, reasonable and in the public interest.

19. In support of this Application the Company provides the testimony of witnesses: Jeffrey K. Larsen, Vice President of Regulation, and Steven R. McDougal, Director of Revenue Requirement.

IV. PROPOSED COMMISSION PROCEEDING PROCESS

20. Given the lengthy discussions held with interested parties and the significant analytical review that was undertaken with them, as described in the direct testimonies of Mr. Larsen and Mr. McDougal, PacifiCorp respectfully requests that the Commission complete its review and issue an order with respect to this Application no later than July 1, 2016. The Company also proposes that within 30 days of receipt of the Application, the Commission establish a schedule for further proceedings.

V. CONCLUSION

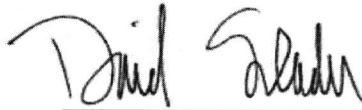
WHEREFORE, by this Application, PacifiCorp respectfully requests that the Commission issue an order approving the 2017 Protocol inter-jurisdictional allocation methodology as described in

the direct testimony of Company witnesses Mr. Larsen and Mr. McDougal no later than July 1, 2016.

DATED this 31st day of December 2015.

Respectfully submitted,

PACIFICORP

A handwritten signature in dark ink, appearing to read "Daniel Solander", written over a horizontal line.

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